



Robert Vick

08/14/2000 07:26 AM

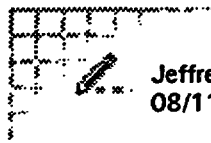


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Subject: LIBBY UPDATE

----- Forwarded by Robert Vick/ENF/R8/USEPA/US on 08/14/2000 07:24 AM -----



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08/11/2000 12:15 PM

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LIBBY UPDATE

July 25, 2000

Grace Draft Work Plan for the Export Plant

The initial work plan (June 6, 2000) developed by W.R. Grace was considered incomplete and inadequate in addressing the desired and needed cleanup at the site by both the Environmental Protection Agency (EPA) and the Department of Environmental Quality (DEQ). On June 28, 2000, W.R. Grace delivered a revised work plan incorporating both EPA's and DEQ's comments. The revised plan substantially changed the original proposal for asbestos removal at the former Export Plant. The major change was to decontaminate each building on the property rather than do total demolition. After a lengthy discussion with the EPA (including pointing out DEQ's concerns about decontamination vs. demolition), DEQ was informed that the EPA must give W.R. Grace the opportunity to try to abate the buildings rather than demolish. However, by collecting samples and assessing W.R. Grace's efforts, EPA will have the ability to determine whether W.R. Grace's efforts are successful at the end of remedial work and whether demolition is ultimately needed.

On July 12, 2000, EPA and DEQ held a conference call (in the Libby office) with W.R. Grace to discuss the agencies' comments on the revised work plan. After a lengthy debate and discussion (more than 3 hours), it was determined that the revised work plan would be approved after W.R. Grace incorporated the comments outlined in EPA's comment letter. Prior to the phone conference with W.R. Grace, EPA and DEQ discussed the revised work plan and it was determined that most of DEQ's comments were similar to EPA's. All outstanding DEQ comments were discussed and settled between EPA and DEQ. For example, the revised work plan does not discuss the relocation of the current property user, Millworks West; however, after discussing this with the EPA, DEQ learned that the matter had been settled after the revised work plan was developed.

Once the work plan is approved, W.R. Grace will begin relocating Millworks West. A temporary storage facility will be built to house the lumber. The retail store will be moved to a location in town. After the relocation is complete, W.R. Grace will begin abatement and cleaning, followed by soil excavation. The work is expected to begin as early as the last week of July and will last a minimum of 17 weeks.

Action Memorandum – Screening Plant Facility

Marcor, EPA's contractor for the asbestos removal work, completed the inventory of the Parker's property and has begun decontamination. The Parker's are in the process of relocating into a long-term housing situation. Once their personal property has been removed, demolition of all the buildings will begin, followed by complete soil excavation. Remedial actions include the removal of contaminated soil from the property directly east of the former Screening Plant and directly across the Kootenai River (former railroad loading facility). The demolition of the buildings is expected to begin as early as the last week of July. The total remedial action is expected to last a minimum of 25 weeks and cost an estimated \$3.9-\$4.2 million.

Mine Site Property Issue

W.R. Grace and the Kootenai Development Corporation (KDC) are still negotiating the sale of the mine site back to Grace. Messages about the sale of the property are a bit confusing. The latest update from Mark Owens (current owner) and Grace (Allan Stringer) is that W.R. Grace is buying the entire mine site from KDC and that the agreement will be complete prior to the end of the month. However, the message from the EPA is that the EPA has an agreement (not signed yet) with Mark Owens allowing EPA access to the site for disposal. The agreement indemnifies Mark Owens of any and all liability from any and all material disposed of by the EPA at the mine site. However, in the revised work plan, W.R. Grace proposes two disposal options for the contaminated soil and material from the Export Plant, (1) disposal at the mine site, and (2) disposal at a landfill Spokane. Finally, after the July 12, 2000, phone conference call, W.R. Grace indicated that they are still looking at disposal areas at the mine site and that the mine site location was their preferred option.

Rainy Creek Road

Rainy Creek Road will be treated with a temporary dust abatement solution (most likely magnesium chloride) in August. The road has been closed to public traffic (signs are currently being posted). Once all remedial work is completed, EPA will pave the road from Highway 37 up to the gate (end of county property). Who will be responsible for the cost for long-term maintenance of the paved road is, as of yet, undetermined.

Medical Center

The facility that will house the medical screening program is operational. The medical screening of Libby residents has begun. More than 500 people have been screened so far. To date, approximately 3,260 residents have been scheduled for medical testing. Finally, EPA is looking into ways for arranging the screening of former workers now living in Nevada.

Residential Home Insulation Issue

Both the EPA and the DEQ feel strongly that potential dangers associated with vermiculite home insulation is high and should be looked at in greater detail. In addition, both the EPA and the DEQ have stated numerous times, and continue to stress, that residents should not disturb the insulation in their homes since the insulation could contain dangerous levels of asbestos. EPA has mentioned that 119 homes have been sampled to date, yet the agency cannot determine the level of risk in homes due to numerous problems. EPA will be able to inform the public of the potential risk (or non risk) once the Phase II investigation is completed later this summer.

Phase II Investigation

To determine the level of risk associated with residential homes, EPA is developing an investigation plan. The following outlines EPA's proposed actions:

1. Collect pure asbestos samples from the mine (collected this June).
2. Develop new standards for testing from the samples (currently being completed).
3. Test standards using different analytical methods. Methods include Transmission Electron Microscopy, Scanning Electronic Microscopy (two types), Polarized Light Microscopy, and Infrared Spectroscopy. (DEQ and EPA are in the process of reviewing the plan).
4. Re-analyze past residential insulation and dust samples.

In addition, the EPA will conduct an Exposure Scenario Assessment. The Exposure Scenario will depict daily residential scenarios. EPA sampling teams will enter homes to conduct additional testing of homes. Four scenarios will be evaluated:

1. Daily cleaning of home (i.e. vacuuming, dusting, sweeping etc);
2. Working in the attic (i.e. fixing a light);
3. Worse case scenario aggressive sampling (indoor testing with a leaf blower); and
4. Outside working in the garden or on the gravel driveway.

Work will start in August. EPA plans on testing 20 more homes using the above four scenarios.

Finally, the EPA is revising the former risk assessment methodology for asbestos. Experts in risk assessment (RA) for asbestos will develop a RA using tremolite as the major component. In addition, the RA will look at the risk of fibers of all lengths and widths. This will be completed by this fall.

Points of Interest

Ambient air samples collected in the town have shown no levels of asbestos fibers present in the town.

EPA is offering (on July 29, 2000) to the public a free education session on how to handle asbestos properly.

EPA is offering (at a cost of \$200/person) to the public 40-hour hazard waste training course in Libby.

EPA is planning on hiring 15-20 local persons to help work on the remedial work.

Marcor/EPA will hire some local people to help with the removal at the Screening Plant.

The local hospital is starting to look into setting up a Libby Trust that can help people with their long-term medical cost. Mike Donovan, Frank Crowley and Alan Payne attended the last CAG meeting to discuss trust options.

DEQ will inspect the former Grace Exfoliation Facility in Lewistown on Monday, July 24, 2000.